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\* ADMITTED IN NY & NJ

November 23, 2020

**BY ECF**

The Honorable Frederic Block  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: United States v. Barca et al., 19 CR 575 (FB)  
*Richard Martino - Defendant***

Your Honor:

I write to request that, in the event that Richard Martino's COVID test is negative, he be granted a bail modification in order to attend Thanksgiving dinner at the home of his daughter in Rye, New York.

We request a blackout period of noon to 8:00 p.m. in order to provide Mr. Martino time to attend the dinner and to travel to and from his home.

Mr. Martino is already permitted daily visits to the home of his daughter in order to visit with family. This request amounts to an extension of the daily blackout period in order to accommodate the special occasion.

I have contacted Pretrial Services in the Southern District of New York, where Mr. Martino resides. They, in turn, have been in touch with their counterparts in the Eastern District of New York. Pretrial Services has no objection to this request. I have also been in contact with the prosecutors. They, too, have no objection to this request.

Accordingly, we would respectfully request that Mr. Martino be permitted to attend Thanksgiving dinner at the home of his daughter from noon to 8:00 p.m.

Most respectfully,

/s/

Maurice H. Sercarz

cc: All Parties (by ECF)

USPTO Shavoy Atkinson (by email)  
U.S. Pretrial Services EDNY

USPTO Leo Barrios (by email)  
U.S. Pretrial Services SDNY